

## REMARKS/ARGUMENTS

Claims 1-52 are currently pending in this application. No claims have been amended. Applicants respectfully request reconsideration of this application based on the following remarks.

### *Claim Rejections – 35 USC § 103*

The Office Action rejects claims 1-25, 27-32, 37-45 and 47-48 under 35 U.S.C. §103(a) as being unpatentable over Haas (US 6,304,556), in view of Belcea (US 2002/0080750), and further in view of Aihara (US 2002/0082035); and rejects claims 26, 33-36, 46, and 49-52 under 35 U.S.C. § 103(a) as being unpatentable over Haas, in view of Juitt (US 7,042,988), in view of Belcea, and further in view of Aihara. To the extent these rejections remain applicable to the claims, as amended, the Applicants respectfully traverse these rejections, as follows.

Claim 1 recites, *inter alia*, “wherein the ad hoc network comprises a plurality of clusters, *each of the clusters comprising at least two piconets*, each of the piconets comprising at least one intra-cluster bridge terminal, a master terminal, and a member terminal slaved to the master terminal, wherein the intra-cluster bridge terminal is a member of the two piconets and is configured to form a communications link between the two piconets” (emphasis added). Independent claims 12, 25-26 and 31-36 recite similar features.

In rejecting the claims, the Examiner acknowledges that Haas and Belcea fail to disclose “each of the clusters comprising at least two piconets,” as recited in claims 1, 12, 25-26, and 31-36. The Examiner, however, relies on Aihara for this feature. In particular, the Examiner alleges that Aihara, in paragraph [0071], discloses an ad hoc network that comprises a plurality of clusters, where *each of the clusters comprises at least two piconets*. Applicants respectfully disagree.

Aihara discloses a system for optimizing cluster configurations. As shown in Fig. 1 of Aihara, a cluster may contain nodes 1-5, of which node 5 may be a cluster head, and nodes 1-4 may be cluster members. The cluster in Fig. 1, however, is not shown to contain any piconets. In paragraph [0071], Aihara merely describes a cluster configuration in the context of Bluetooth, and refers to a cluster as a piconet. Aihara indicates this explicitly in paragraph [0045]: “[a]s for Bluetooth, the *piconet corresponds to the cluster*, the master corresponds to the cluster head, and the slaves correspond to the cluster members in the embodiments of the present invention”

(emphasis added). There is absolutely no disclosure in Aihara suggesting that the cluster includes any number of piconets. Accordingly, Aihara fails to disclose or suggest that *each of the clusters comprises at least two piconets*, as recited in claims 1, 12, 25-26 and 31-36.

Additionally, there is no combination of Haas, Belcea and Aihara that discloses or suggests that each of the piconets comprises at least one intra-cluster bridge terminal, wherein the intra-cluster bridge terminal is a member of the two piconets and is configured to form a communications link between the two piconets, as is presently recited.

Secondary reference Juitt, either individually or in combination with Haas, Belcea and Aihara, also fails to disclose an ad hoc network comprising a plurality of clusters, *each of the clusters comprising at least two piconets*, each of the piconets comprising at least one intra-cluster bridge terminal, wherein the intra-cluster bridge terminal is a member of the two piconets and is configured to form a communications link between the two piconets, as recited in claims 1, 12, 25-26, and 31-36. Thus, the addition of Juitt fails to make up for the deficiencies of Haas, Belcea and Aihara.

In accordance with the above remarks, Applicants respectfully submit that Haas, Belcea, Aihara, and Juitt, either individually or in combination, fail to disclose or suggest at least the features recited in claims 1, 12, 25-26 and 31-36.

Accordingly, Applicants submit that claims 1, 12, 25-26, and 31-36 define patentable subject matter. Claims 2-11, 13-24, 27-30, and 37-52 depend from claims 1, 12, 25-26, and 31-36, respectively, and therefore, also define patentable subject matter, as well as for the additional features recited therein.

Therefore, based on the foregoing, the Applicants respectfully request that the Examiner withdraw the § 103(a) rejections.

### CONCLUSION

In light of the above, Applicants submit that the application is in condition for allowance, for which early action is requested.

Please charge any fees or overpayments that may be due with this response to Deposit Account No. 17-0026.

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Respectfully submitted,

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